

IN THE UNITED STATES DISTRICT COURT [FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:18 CR 121 HSO-RHW

AMBROSE DEJUAN NELSON

21 U.S.C. § 846 21 U.S.C. § 841(a)(1)

The Grand Jury charges:

COUNT 1

That from on or about May 1, 2017, until the date of this indictment, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **AMBROSE DEJUAN NELSON**, did knowingly and intentionally conspire with others known and unknown to the Grand Jury, to possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance and 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and (b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

That on about July 7, 2018, in Jackson County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, AMBROSE DEJUAN NELSON, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: a) cannot be located upon exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the Court; d) has been substantially diminished in value; or e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 21, United States Code, Section 853.

D. MICHAEL HURST, JR.

United States Attorney

A TRUE BILL:

s/signature redacted
Foreperson of the Grand Jury

JNITED STATES MAGISTRATE JUDGE